

10-19-82

AFFIDAVIT OF GERRY ARMSTRONG

I, Gerry Armstrong, hereby state under the pains and penalties of perjury that I have personal knowledge and/or information and belief as to the following:

1. In early 1976 I was in charge of L. Ron Hubbard's Personal Communications Unit in a condominium called King Arthur's Court in Dunedin, Florida. L. Ron Hubbard was at that time in Washington, D.C., with a small personal staff, having fled from Florida in February or March 1976 because it was feared that there might be an attempt to serve him with a lawsuit in Florida. My job at Dunedin entailed, among other duties, relaying mail and telexes between Mr. Hubbard in Washington D.C. and various Scientology organizations in Florida, California and elsewhere.

2. In May of 1976, I received orders from Michael Douglas, my senior and Mr. Hubbard's personal communications expert who was with him in Washington, D.C., to set up a permanent residence in southern California for Hubbard. I was briefed at that time and sent on a mission to set up a staging area in southern California for the permanent residence in California. In late May 1976, I drove with 3 other people, Gary Reisdorf, then my assistant, and Clarisse Barnett and Jill Goodman, CMO members, to Los Angeles, where we met with Duke Snyder, than Deputy Guardian US, the second in command of the US Guardian's Office.

3. I learned from Mr. Snyder that he had already arranged the "staging area" for Mr. Hubbard in an apartment complex in Culver City, California and was working on finalizing a permanent residence which Mr. Hubbard had ordered. I was taken by Mr. Snyder to the Culver City locations which was code-named by the GO and Mr. Hubbard's personal staff, "Astra." Astra consisted of three apartment units in the complex. I set up a telex machine with telephone phonetic coupler for Mr. Hubbard's telex communications to Scientology organizations, and I established mail and freight lines to and

from Mr. Hubbard via the US Guardian's Office communications bureau.

4. In early June of 1976, Mr. Hubbard's wife, Mary Sue Hubbard, then Controller of the Guardian's Office, and her personal staff arrived at Astra and set up residence and operations. A few days later Mr. Hubbard arrived with the staff which had been with him in Washington, D.C., and likewise set up residence and operations at Astra. During this period I learned the specifics of Mr. Hubbard's plan for residency following the Astra "staging area." I saw several letters from Mr. Snyder to Mr. Hubbard, plus maps and photographs, all concerning a home and property to be purchased for Mr. Hubbard in La Quinta, California. Mr. Hubbard had several requirements for the property, and I was involved in gathering information of some of these, including the availability of Cable television at the property.

5. In late 1976, Mr. Hubbard moved from Astra to the La Quinta property and lived there until 1979. There were three adjacent properties in La Quinta purchased in 1976 for Mr. Hubbard, his family and personal staff. These were named "Olives," "Palms," and "Reuffel Ranch" (called "Rifle"). The Olives property was originally designated as Mr. Hubbard's residence but he did not like it and chose

"Rifle" property as his and his wife's residence.

6. In August 1977, shortly after the FBI raid on the Guardian's Office premises in Los Angeles and Washington, D.C., and because he feared that he might be implicated in Guardian's Office operations and therefore indicted in the FBI's Federal case, Mr. Hubbard temporarily fled from the Rifle property at La Quinta with three CMO personnel, Pat Broeker, Claire Rossouw and Diana Voegeding. He lived from August 1977 to December 1977 in hiding in Sparks, Nevada, but continued to communicate with CMO at the La Quinta properties during that period. I have personally seen letters from Mr. Hubbard during this period to persons at the La Quinta properties stating that he would be returning to his home in La Quinta as soon as it was safe to do so, and issuing orders, specifically to do with establishing and training a film crew at La Quinta while he was away.

7. While Mr. Hubbard was in Sparks, Nevada, Mrs. Hubbard resided at the "Rifle" property in La Quinta. At the end of December 1977, it was determined that Mrs. Hubbard would be indicted in the Federal criminal case, and Mr. Hubbard would not. Mrs. Hubbard left "Rifle" to take up resi-

dence in the Los Angeles area and Mr. Hubbard moved back to Rifle from Nevada.

8. During all of 1978, Mr. Hubbard resided at the "Rifle" property in La Quinta. I observed him almost daily during this period and many times had guard duty at his residence. A guard was always on duty, twenty-four hours a day, at his residence, and during times when his wife visited or stayed at the Rifle property there were at least two guards on duty. The reason for this doubling of the guards was that it was feared by Mr. Hubbard that Mrs. Hubbard might be tailed by Federal agents to Mr. Hubbard's residence in La Quinta.

9. Each guard on duty patrolled the perimeter of Mr. Hubbard's property and was instructed to stop anyone who came onto the property. The guard carried a two-way radio which transmitted an alarm signal to several other locations on the La Quinta properties, alerting several people of a raid threat or someone attempting to serve papers on Mr. Hubbard. A car was kept stationed beside Mr. Hubbard's Rifle residence which was designated as a "get-away car," and which was never used for any other purpose.

10. Each person at the La Quinta base was briefed and drilled in a "cover story" designed to "protect" and cover up Mr. Hubbard's residing on the property. Each of us did drills on how to "handle" a process server, including denying that we knew Mr. Hubbard or that he lived on the property. We were all instructed and drilled to say that the property was owned by an attorney, Norton Karno, and we were all Mr. Karno's friends. In fact, none of us had ever met Mr. Karno, and he was Mr. Hubbard's tax attorney at the time.

11. In the fall of 1978, Mr. Hubbard ordered a number of renovations to his home at "Rifle" in La Quinta and I participated in or supervised most of these renovations. Ordered by Mr. Hubbard, and carried out by me or personnel in my charge were: removal of all fiberglass insulation on ducting and replacement with non-fibrous material, complete cleaning of all ducting in the house, tiling his bedroom and office spaces, carpeting his wife's bedroom and office space and the living room, cleaning of all air conditioner and evaporative cooler units and ducting, painting of interior of complete house, cleaning the complete house, setting up his library, setting up and inventorying his personal belongings stored on the Rifle and Olives property which con-

sisted of about a thousand boxes or equivalent large items such as furniture.

12. In late 1978, because it was considered that the cover at La Quinta was "blown," and because he felt in danger of being served with process, Mr. Hubbard decided to acquire another property which would be safe for him to reside and carry on his operations. He approved for purchase a 500-acre golf course and resort complex at Gilman Hotsprings near Hemet, California and about forty miles west of the La Quinta properties. In December 1978, immediately following the project to renovate Mr. Hubbard's residence at La Quinta, I, and about twenty other personnel, were transferred to Gilman Hotsprings to ready a house for Mr. Hubbard's residency.

13. The various steps to be taken in the renovation of the house at Gilman Hotsprings for Mr. Hubbard were all ordered by him and the funds for these were all approved by him. The renovation project included: the complete stripping of attic insulation and cleaning of the attic; re-wiring of the complete house; tiling of Mr. Hubbard's bedroom; carpeting of Mrs. Hubbard's bedroom and the living room, dining room and other rooms; installation of new fix-

tures in the bathrooms according to his specifications; fabrication of custom-made drapes from materials approved by Mr. Hubbard; painting of the complete interior of the house according to a color scheme and paint types ordered by Mr. Hubbard; the installation of an air conditioner unit approved by Mr. Hubbard; the installation of new doors and cupboards according to orders or approval by Mr. Hubbard; the purchase of decorations according to Mr Hubbard's instructions; grounds work, including the purchases and planting of several thousand dollars worth of trees ordered by Mr. Hubbard; the grading and asphaltting of a vehicle parking area adjacent to the house ordered by Mr. Hubbard; the installation of a sophisticated television antenna system approved by Mr. Hubbard; the installation of a lightning rod approved by Mr. Hubbard; the renovation of an adjacent building to be used as living quarters by Mr. Hubbard's personal steward, Mr. Paco Suarez; and other project steps.

14. I was also involved in, and during much of 1979 supervised, the renovation of resort villa suites which were designated as office spaces for Mr. Hubbard and Mrs. Hubbard. Here, as with his house at Gilman Hotsprings, Mr. Hubbard ordered or approved the renovations, materials used, decor and decorations. Included in this part of the

project were: tiling of Mr. Hubbard's office; tiling of Mr. Hubbard's music room and library; installation of new fixtures according to Mr. Hubbard's specifications in the bathrooms in these areas; new carpeting of Mrs. Hubbard's office and offices for Mr. Hubbard's CMO personnel and Mrs. Hubbard's secretary; installation of new air conditioner units according to Mr. Hubbard's approval; installation of a high quality radio antenna for his music room according to his approval; the fabrication of special throw rugs according to his orders; contracting for two wall hung tapestries to be woven according to his orders; fabrication of special sound-insulating drapes according to his orders; construction of doorways between the various villa units in his office spaces according to his orders; the purchase and installation of a refrigerator in one of the office spaces for his use; and other steps.

15. During all of 1979 and until March 1980, Mr. Hubbard lived, along with about ten personal staff, in an apartment complex in Hemet about five miles from the Gilman Hotsprings property. He did not move into the house at Gilman Hotsprings because early in 1979 its renovation was

not complete and later it was considered unsafe for him to live on the property, its cover having been "blown" in Riverside, California and Florida newspapers.

16. Mr. Hubbard came to the Gilman Hotsprings property several times in 1979, however, each time travelling in the back of a panel van. I was then in charge of Mr. Hubbard's personal household unit at Gilman Hotsprings and had to ensure that his van got onto the property without being followed or seen, even by other staff at the property. Mr. Hubbard came to the property either to supervise filming at a studio which had been built on the property or to meet with his wife or family on the property. On such occasions, Mrs. Hubbard also arrived secretively and I had to ensure she was not followed or observed coming onto the property.

17. Each time Mr. Hubbard came to the property he went to his house and had a meal which was usually cooked by his personal chef, Sinar Parman, and served by his personal steward, Mr. Suarez. No one else but Mr. Hubbard had use of or access to the house, unless it was his personal staff carrying out renovations or cleaning the house. Parctically every time Mr. Hubbard was in the house he ordered a change

or some new work. On one occasion, for example, he ordered a serving table to be built for the dining room. On another occasion he ordered special dacron filter material to be taped over each window in the house. And on one occasion he smelled mildew on my LRH renovations unit and I had to tear out bathroom and bedroom walls, install a new shower stall and rebuild the walls.

18. Mr. Hubbard also stored on the Gilman Hot-springs property his personal belongings which had been moved from the La Quinta property when that property was abandoned and sold because it was "blown." Mr. Hubbard's personal belongings, consisting of furniture, bedding, art pieces, household goods, appliances, papers and writings, etc. occupied the complete top floor of a former hotel on the Gilman Hotsprings property. One of my juniors, Brenda Black, was responsible for storage and inventory of these belongings. None of Mr. Hubbard's belongings in storage could be taken out without his express permission.

19. As well as the hotel storage space there were several villa suites devoted to storage of Mr. Hubbard's personal effects. One contained his personal collection of photographs and photographic equipment. This suite was

specially climatized for the storage of these items, according to Mr. Hubbard's instructions. Another villa suite contained Mr. Hubbard's excess and seldom used clothing, hung on racks or stored in trucks. Another villa suite contained Mr. Hubbard's library of books.

20. Also in 1979 I was responsible for the renovation of living quarters for Mr. Hubbard's children, Arthur, Suzette and Diana and her husband at Gilman Hotsprings. Special units were renovated for each of Mr. Hubbard's children on the property, the work to be done and the location of each unit being approved by Mr. Hubbard and carried out by his personal renovations staff of which I was in charge.

21. Most of the furniture in Mr. Hubbard's house and offices at Gilman Hotsprings was to be custom made according to a motif worked out and orders from Mr. Hubbard. To carry out this plan he authorized the purchase of carpentry tools costing several thousand dollars and the establishment of an LRH carpentry unit, with personnel and equipment separate from the other organization units at Gilman Hotsprings. This carpentry unit also produced special recording equipment stands for Mr. Hubbard which were sent to him at his Hemet location. The LRH carpentry unit also

produced custom work for Mr. Hubbard's children's living quarters on the property.

22. In the summer of 1979, on the orders of my senior, Kima Douglas, the head of Mr. Hubbard's personal household unit, I became involved in a project Mr. Hubbard had originated to build him a completely new house somewhere near Hemet. Mr. Hubbard had had a staff member in the Gilman Hotsprings film company music department, Barry Stein, who was also an architect draft plans for a huge private residence. It was to be a specially built structure, all triangular rooms and buildings, and all on pilings, patterned on Mr. Hubbard's orders, after Frank Lloyd Wright's Imperial Hotel in Tokyo, so as to be earthquake-proof. It would have a number of buildings for personal staff, and it would be surrounded by a high block wall with openings for gun emplacements. I had blueprints made of the plans and obtained some information on materials for Mr. Stein. Mainly I acted as relay point between Mr. Stein and Mr. Hubbard when Mr. Stein's plans went back and forth to Mr. Hubbard.

23. At one point I was assigned by Mrs. Douglas to a mission to locate a property for Mr. Hubbard on which he could build the house Mr. Stein had designed. There were

several criteria given by Mr. Hubbard: the property had to be within a half hour drive of Gilman Hotsprings in California; it had to be in a non-black area; it had to be in a dust-free area; it had to be in a defensible area, i.e., with no higher surrounding areas from which a rifle could shoot into the compound; and it had to be built on bedrock. I spent about two weeks on this mission and finally located a property which seemed to meet all of Mr. Hubbard's requirements. I sent a proposal to Mr. Hubbard, it was approved and I was sent a deposit to open an escrow. Mr. Hubbard and Mrs. Douglas visited the property I had located, which was near Perris, California, and examined it. Mrs. Douglas then told me not to proceed with the purchase because although Mr. Hubbard was very pleased with the property he had, at the last minute, decided to build the new house on the Gilman Hotsprings property.

24. I then began library research and an examination of the Gilman Hotsprings property in order to choose the best location on which to build, since an earthquake fault ran through the property. Also an executive on the Gilman Hotsprings staff, Bill Robertson, who is also an engineer, became involved, and the project passed over to him. In

late 1981, when I left Scientology, the plan was still active. On a visit to Gilman Hotsprings in 1981, I observed Mr. Stein and another staff member, Stuart Moreau, working on Mr. Stein's plans for this house.

25. Also in 1979 and into 1980 I was in charge of another project which was to have constructed and decorated another office for Mr. Hubbard, this one in a movie studio built in 1979 on the Gilman Hotsprings property. I worked with one of my juniors at the time, Laurel Van Dyne, the LRH Decor-In-Charge, on a proposal for the interior decoration of the office which went to Mr. Hubbard and was approved by him. He also approved funds for the whole project and I purchased most of the supplies, materials, fabric, fixtures and appliances which were to go into this office. As part of this project, photographs of various Scientology movie and entertainment personalities were solicited from them, signed by them and with messages of respect to Mr. Hubbard. These were to be framed and were to be part of the decor of this office.

26. In March of 1980, Mr. Hubbard fled from his Hemet residence to another location in Southern California,

because it was again determined that his whereabouts might be known to authorities or litigants and he would be served a summons or subpoena. Only two people, Pat Broeker and Annie Broeker, from his CMO unit, went with him. The rest of his staff from Hemet returned to Gilman Hotsprings. These people, who were called the "X" staff, approximately ten in all, carried on a bizarre scheme to keep their identities secret so that they could later rejoin Mr. Hubbard when he would again set up a larger secret base. They worked, lived and ate separately from the rest of the Gilman Hotsprings staff, they were never visible to outsiders, they wore disguises or hats which covered their faces, and they travelled, even when only going between buildings on the Gilman Hotsprings property, in a blacked-out van.

27. When Mr. Hubbard and the Broekers left Hemet, they moved to another Southern California location. It was known that they were in Southern California because Pat Broeker could, and did quite often, on very little notice, show up in the Los Angeles area to handle some business with Mr. Hubbard. Generally, this was financial business with Mr. Hubbard's personal accounts staff. It was also known, among Mr. Hubbard's personal office staff, of which I was a part, that another

CMO member, David Miscavige, who lived at Gilman Hot-springs, was Mr. Hubbard's main contact to all the Scientology organizations. Mr. Miscavige relayed communications to Mr. Hubbard and the Broekers, and received Mr. Hubbard's communications and orders for implementation.

28. It is my understanding that Mr. Hubbard is still residing in, and intends to continue to reside in, Southern California. A mission composed of CMO members, sent by Mr. Hubbard in 1981 to resolve his legal troubles, was given the order by him to establish an "all clear date." This would be the date when all the court cases involving Mr. Hubbard had been won or charges against him had been dropped and it would be safe for him to come out of hiding and return to Gilman Hotsprings. At one point the date set was October 1981 and this was moved up to December 1981. It was in anticipation of an "all clear" that the work on Mr. Hubbard's house and offices at Gilman Hotsprings in 1981 was ordered completed.

29, Except for a four month period in 1977, Mr. Hubbard has resided in Southern California since June of 1976. Also, his wife has resided in Southern California

during that time and his children are all residents in Southern California. Additionally, the people who were considered Mr. Hubbard's personal staff all reside in Southern California.

30. It has been the policy and practice of those persons in senior positions in Scientology, as directed by Mr. Hubbard to lie about his involvement with Scientology, his control of operations and finances, and his whereabouts, even from other Scientologists. I had personal knowledge of an operation by the Guardian's Office to plant the false story in the international press that Mr. Hubbard was planning to purchase an estate in Ireland. This was done to cover up the fact that Mr. Hubbard was planning to establish a residence in California.

31. Also in 1976, in order to hide the fact from Scientologists and authorities in Clearwater that Mr. Hubbard had left the area he had one of his personal staff at the Dunedin location sign his name to despatches sent him from Scientology staff members. This staff member, Joyce Popham, was so proficient at forging his signature and handwriting that she wrote messages like "very well done," "thank you

very much" and similar things in Mr. Hubbard's handwriting back to organization staff who knew his writing. The forgeries were never discovered. The practice of having one of his staff sign his signature was on Mr. Hubbard's orders and was very common. It was used to give the impression Mr. Hubbard was someplace he wasn't or to cover up some other activity. Staff members whom I knew personally to have signed Mr. Hubbard's name to letters, contracts or legal documents or in inscriptions in books, were: Aletheia Taylor, Janice Kennedy, Laurie Jensen, Joyce Popham, Sue Anderson, Laurel Sullivan.

32. It has also been the policy and practice of persons in senior positions in Scientology, as directed and allowed by Mr. Hubbard, to originate communications in Mr. Hubbard's name as pretending to come from Mr. Hubbard, without these communications ever being shown to him. The purpose of this was to create an impression that Mr. Hubbard was doing something that he wasn't actually doing; or was somewhere he actually was not. Persons that I knew personally to have originated such communications were: Laurel Sullivan, Sue Anderson, Aletheia Taylor, Pat Brice, Laurie Jensen.

33. I also knew it was the policy and practice of Mr. Hubbard and those in senior positions in Scientology to actually lie about Mr. Hubbard's whereabouts and activities. Mr. Hubbard stated, as part of his defense in what is known in Scientology as the "French fraud case" in which he was convicted of fraud, that he had never even been in France. That was a lie. Mr. Hubbard lived for a period of time in the late 1960's, in a villa in Marseille, France.

34. Following the FBI raid in 1977 on Scientology's Guardian's Office premises in Los Angeles and Washington, D.C., the people in senior positions in the CMO and the GO ordered and had carried out a massive campaign to locate and destroy all the evidence in every organization in the US which showed Mr. Hubbard's control of the organizations and their finances. I was involved in this campaign in Clearwater, Florida, at the La Quinta property and at Gilman Hotsprings. Hundreds of thousands of pages were destroyed. On the La Quinta and Gilman Hotsprings properties we were required to destroy, in addition to materails which showed Mr. Hubbard's control of Scientology and his connection with the Guardian's Office, any despatches or memos to and from Mr. Hubbard which showed he lived on these properties,

intended to live there or had issued orders to do with these properties. At Gilman Hotsprings I was required to destroy all the memos I had received from Mr. Hubbard ordering work to be done on his house and offices. Also I was required to destroy any despatch or memo from anyone which mentioned the house and office spaces as being Mr. Hubbard's. In early 1980, when a raid by government agencies was announced as threatened at Gilman Hotsprings, a commercial paper shredder was rented, brought to the property and operated day and night for over two weeks to destroy the massive pile of evidence which linked Mr. Hubbard to Scientology organization, Guardian's Office operations and the properties in Southern California.

Signed under the pains and penalties of perjury
this 19th day of October, 1982.

Gerry Armstrong

STATE OF CALIFORNIA,

COUNTY OF Orange

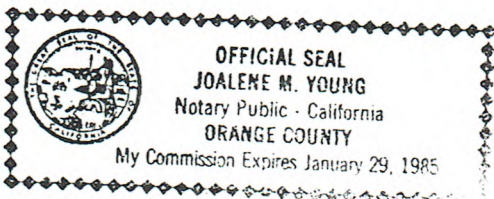
} ss.

ON October 19, 1982,
before me, the undersigned, a Notary Public in and for said State, personally appeared

Gerry Armstrong

_____, known to me,
to be the person whose name is subscribed to the within instrument,
and acknowledged to me that he executed the same.

WITNESS my hand and official seal.



Joalene M. Young
Notary Public in and for said State
Joalene M. Young